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AWMD/RCAP

February 19, 2015

Ms. Christine Kump-Mitchell  
Project Coordinator, Hazardous Waste Program  
MDNR St. Louis Regional Office  
7545 S. Lindbergh, Suite 210  
St. Louis, MO 63216

Re: Modine Manufacturing Company – Camdenton, MO  
Quarterly Report for period ending December 31, 2014  
AOC No. 99-HW-002

RCRA



Dear Ms. Kump-Mitchell:

The following is a summary report of the activities completed from October 1, 2014 through December 31, 2014 at the above referenced site. This report is being submitted as required by the Corrective Action Abatement Order on Consent, Order No. 99-HW-002 (AOC) paragraphs 91 through 94.

**Description of work completed during the quarter:**

During the reporting period, Modine had continued discussions with the facility property owner concerning the status of the building's heating ventilation and air conditioning (HVAC) system. Operational issues with the HVAC controls continued to exist during the reporting quarter. As a result, indoor air conditions were not representative of an occupied facility during this reporting period. The building has not been occupied since Modine vacated the facility in April 2012.

**Summary of findings, data, etc.:**

No additional data was collected or submitted during this monitoring period.

**Summary of problems or potential problems and any corrective measures implemented:**

See the discussion in the above paragraphs related to the HVAC system controls.

**Projected work for the next reporting period:**

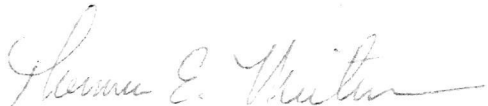
Modine intends to keep in contact with the property owner to follow the status of the property's sale and to keep current with any modifications to the HVAC system. As we discussed, Modine prefers to await the return of the HVAC system to a fully functional state prior to conducting indoor air vapor intrusion sampling. However, given limited options at this point coupled with the desire to achieve closure of this project, Modine is planning to conduct a winter sampling event in March under current conditions with the understanding that those would be a worst-case scenario and not representative of an occupied facility. Modine will be requesting MDNR to confirm that indoor air sampling results from a worst case scenario sampling event would not obligate Modine to perform any specific remedial activities in the event the results were above indoor air screening levels, only that a follow-up sampling event be conducted under a properly functioning HVAC system.

**Instances of Non-compliance with the requirements of the Order:**

There were no instances of non-compliance with the requirements of the Order during this reporting period.

If you have any questions concerning this report, please contact Mr. Thomas Meitner, EH&S Manager at (262) 636-1412, or by email at [t.e.meitner@modine.na.com](mailto:t.e.meitner@modine.na.com).

Sincerely,



THOMAS E. MEITNER for

Jeffrey A. Decker  
Director of Operations – North America

Cc: B. Aston - U.S. EPA – Region 7  
S. Poplawski - Bryan Cave, LLP  
M. Martin - CH2MHill  
R. Macrum - Simmons First National Bank  
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